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JUDGE CAPRONI

Attorneys for Plaintiffs

14 CV 7062

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FAR EAST BROKERS AND CONSULTANTS, INC.; :
HORIZON GROUP USA, INC. and :
BETSY & ADAMS LTD. :

Docket No. 14 cv ____ ()

Plaintiffs, :

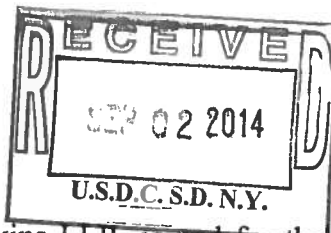
- Against - :

M/V SUEZ CANAL BRIDGE, her engines, :
boilers, etc. *in rem*; HANJIN SHIPPING CO. LTD.; :
YANG MING LINE (HK) LTD.; :
RS LOGISTICS LIMITED; :
and VIRGO CARRIERS CORP SA; :

Defendants. :

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COMPLAINT



Plaintiffs, by and through their attorneys Hill Rivkins LLP, as and for their complaint against the above-named vessel and defendants, allege upon information and belief as follows:

PARTIES

1. At and during all times hereinafter mentioned, Plaintiffs were and now are corporations or other business entities with principal offices and places of business stated in Schedule A (annexed hereto and incorporated herein) having interests in certain bills of lading.

2. At and during all times hereinafter mentioned, Defendants were and now are corporations or other business entities with principal offices and places of business stated in

Schedule A (annexed hereto and incorporated herein) and were and now are engaged in business as common carriers of goods for hire and owned, operated, chartered, managed and/or controlled the M/V SUEZ CANAL BRIDGE which is or will be in the jurisdiction of this Court during the pendency of this action.

JURISDICTION

3. This Honorable Court has subject matter jurisdiction pursuant to 28 U.S.C. §1333 and this is an admiralty and maritime claim within the meaning of Rule 9(h) of the Federal Rules of Civil Procedure.

THE CLAIM

4. On or about the dates and ports of shipment listed in Schedule A, there was delivered to Defendants in good order and condition the shipments described in Schedule A suitable in every respect for the subject transportation which Defendant received, accepted and agreed to transport for certain consideration.

5. Defendants failed to re-deliver the subject shipments in the same good order and condition as when they were received.

6. By reasons of the premises, Defendants breached and violated their duties and obligations and as common carriers and bailees of the cargo, was negligent and careless in their handling of the subject shipments and were otherwise at fault.

7. Plaintiffs were the shippers, owners, consignees and/or insurers of the subject shipments and brings this action on their own behalf and on behalf of all parties who are or may become interested in the subject shipment, as their respective interests may ultimately appear, and Plaintiffs are entitled to maintain this action.

8. Plaintiffs have performed all duties and obligations on its part to be performed.

9. By reason of the premises, Plaintiffs have sustained damages as nearly as same can now be estimated, no part of which has been paid, although duly demanded, in the total amount of \$409,924.57, plus interest, costs and attorneys' fees.

WHEREFORE, Plaintiffs pray:

1. That process in due form of law according to the practice of this Court may issue against the Defendants.

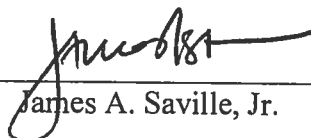
2. That if the Defendants cannot be found within this District, that all of their property within this District be attached in the sum set forth in this Complaint, with interest and costs.

3. That a decree may be entered in favor of Plaintiffs against Defendants the amount of Plaintiffs' damages, together with pre-judgment interest, costs and attorneys' fees.

4. Plaintiffs further pray for such other, further and different relief as to this Court may deem just and proper in the premises.

Dated: New York, New York
August 29, 2014

HILL RIVKINS LLP
Attorneys for Plaintiff

By: 
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RICKMERS GENOA
HILL RIVKINS
CARGO INTERESTS-SKED A

B/L Issuer	B/L No.	Container No.	Loadport	Disport	Shipper	Receiver	Cargo Description	Claim Amount
Yang Ming Line (HK) Ltd. 22nd Fl, Ever Gain Plaza, Tower 1, 88 Container Port Rd, Kwai, Hong Kong, Hong Kong S.A.R., China	YMLUE300362706	TGHU6750463	Yantian	New York	Far East Brokers (HK) Ltd.	Far East Brokers & Consultants, Inc. 3644 Phillips Hwy Jacksonville, FL 32207	toys & novelties	\$33,220.44
Hanjin Shipping Co. 80 East Route 4, Suite 200 Paramus, New Jersey	HJSCHKG3G2745500	DRYU9668631	Yantian	New York	Fortune Arts & Crafts Toys	Horizon Group USA 45 Technology Drive, Warren NJ	scrapbooks, stamps, cards etc.	\$34,292.66
RS Logistics Limited RM 1502, NINA Tower, 8 Yeung UK Road Tuen Wan N.T. China	SZAF1312405A	HJCU1923746	Yantian	New York	Cliffside Fashion Co. Ltd.	Betsy & Adams Ltd. 1400 Broadway, Suite 602 New York, NY	garments	\$342,411.47
Virgo Carriers Corp. S.A. c/o Sea Quest Ship Management Inc. 376, Sampaguita Street San Martin de Porres Ph. 3. Panapaan, 4102 Bacoor, Cavite, Philippines								